

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

- Alexandria Division -

)
ERIK J. CARDIN)
)
versus) **Case No.: 1:19-cv-1646 LO/JFA**
)
LEAH M. OLSZEWSKI)
)
_____)

**PLAINTIFF/COUNTERCLAIM DEFENDANT ERIK J. CARDIN'S
QUESTION FOR THE JURY VENIRE**

Plaintiff/Counterclaim Defendant Erik J. Cardin sets forth his proposed Voir Dire to be used at trial:

1. Do you know or know of either of the parties to this case? The Plaintiff is SMSgt. (R) Erik J. Cardin, and the Defendant is Leah M. Olszewski. SMSgt. Cardin served with the Air Force Air Mobility Command, and served in Iraq and Afghanistan. He retired from the military in September 2018. He now lives in Texas. Leah Olszewski is a Major in the Alabama National Guard.

2. Are you or a family member a member of the military or a military veteran?

3. Within the last 10 years, have you ever served on a jury, either Criminal or Civil?

4. Within the last 10 years, have you been a litigant in a criminal or a civil case in either federal or state court?

5. Have you, a family member or a close friend ever “ghosted” and/or been ghosted (*i.e.*, left with no further communication) by a partner in a serious relationship?

6. Have you, someone related to you, or a close friend been involved in an acrimonious domestic situation that led to a difficult break-up or a very contentious divorce?

7. Have you, someone related to you, or a close friend been either a victim of domestic violence or accused of domestic violence.

8. Have you, someone related to you, or a close friend been falsely accused of a criminal offense?

9. Have you, someone related to you, or a close friend suffered a first trimester miscarriage?

10. Have you, someone related to you, or a close friend been falsely accused of domestic violence?

11. Do you believe that women should *always* be believed in domestic violence cases? Or would you want to hear the evidence before coming to a decision?

12. Do you believe that women should not help defend a man accused of domestic violence by another woman?

13. Are you familiar with a television reality program identified as *Naked & Afraid*?

14. Some of the testimony and/or exhibits may include rough and offensive language. Do you believe that you can be a fair and impartial juror notwithstanding some of the language you may hear in this trial?

15. Do you know or are acquainted with the attorney for SMSgt. Cardin, James Kurz from the Alexandria, VA law firm of Redmon, Peyton & Braswell LLP? Mr. Kurz is assisted in this trial by Abigail Murray. Does anyone know Ms. Murray?

16. Do you know or are acquainted with any of the attorneys or law firm personnel working on behalf of Leah Olszewski? The attorneys or/and professionals who have appeared on behalf of Ms. Olszewski from the law firm of Holland & Knight include

From the Holland & Knight New York City Office

Christine Walz
Deborah Peters
Elvin Ramos
Glenn Huziner
Kathleen Skeele

From the Holland & Knight Washington, D.C. Office

Cynthia Geirhart
Shawn Kirkland

From the Holland & Knight Tysons Corner Office

Robert Farlow
Kevin D'Olivo

17. Do you know or are acquainted with any of the attorneys or personnel from LegalMomentum, a New York City-based legal advocacy group? The attorney who has appeared on behalf of Ms. Olszewski from LegalMomentum is Jennifer Becker. Ms. Becker is the Deputy Legal Director and National Judicial Education Program (NJEP) Senior Attorney for LegalMomentum in New York City.

18. Do you know or are acquainted with any officers or personnel who work or for “Protect our Defenders,” a legal advocacy group with offices in Tyson’s Corner?

Respectfully submitted,

ERIK J. CARDIN
By Counsel

REDMON, PEYTON & BRASWELL, LLP

By: /s/ James S. Kurz

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CERTIFICATE OF SERVICE

I certify that a true copy of this pleading was filed on this the 2nd day of July 2021 via the Court's ECF System, which filing is valid service on all counsel record.

/s/ James S. Kurz
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